

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JAN 14 2015
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,) No.
)
 v.)
)
 COREY AMBUS,)
 JASON DIAZ, and)
 ALPHONSO DIAZ, a/k/a "Al Diaz," and)
 DAWN BEASLEY AMBUS,)
)
 Defendants.)

4:15CR00009 JAR/SPM

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning in or about March 2014, with the exact date unknown, in the Eastern District of Missouri, and elsewhere, the defendants,

COREY AMBUS, JASON DIAZ, and ALPHONSO DIAZ, a/k/a "Al Diaz,"
did knowingly and intentionally combine, conspire, confederate, and agree, together with one or more other persons, whose identities are known and unknown to the Grand Jury, to commit the following offenses against the United States: to knowingly and intentionally distribute and possess with the intent to distribute hydrocodone, Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT II

The Grand Jury further charges that:

Beginning in or about March 2014, with the exact date unknown, in the Eastern District of Missouri and elsewhere,

COREY AMBUS, JASON DIAZ, and DAWN BEASLEY AMBUS,

the defendants herein, did conspire with each other and others known and unknown to this Grand Jury, to commit offenses against the United States, to wit: (a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, to wit: the deposits of U.S. currency into accounts at financial institutions; (b) which in fact involved the proceeds of a specified unlawful activity, to wit: the distribution and possession with intent to distribute hydrocodone, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) as described in Count I; and (c) knowing that the transactions were designed in whole or in part: to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law. While conducting and attempting to conduct said financial transactions, the defendants, **COREY AMBUS, JASON DIAZ, and DAWN BEASLEY AMBUS**, knew that the funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii); and

All in violation of Title 18, United States Code, Sections 1956(h).

A TRUE BILL.

FOREPERSON

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